

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)
v.)
) Case No. 21-1890-M
Kray Strange)
)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 7, 2021 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 2251(a)	Manufacture/attempted manufacture of child pornography
18 USC 2252(a)(2)	Distribution/attempted distribution of child pornography
18 USC 2	Aiding and abetting and willfully causing the manufacture and distribution of child pornography

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

/s/ Daron Schreier

Complainant's signature

Daron Schreier, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: Dec. 17, 2021

/s/ Honorable Marilyn Heffley

Judge's signature

City and state: Philadelphia, Pennsylvania

Honorable Marilyn Heffley, USMJ

Printed name and title

AFFIDAVIT

I, Daron Schreier, a Special Agent with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows:

1. I am a Special Agent with the FBI and have been since January of 2006. Since August of 2006, I have been assigned to the Philadelphia Division where I have been a member of the Joint Terrorism Task Force, the Cyber squad, and most recently the Violent Crimes Against Children squad. I have received training from the FBI in the fields of international terrorism, counterintelligence, computer crime, and the enforcement of federal child pornography laws.

2. This affidavit is made in support of a criminal complaint charging KRAY STRANGE, DOB: 04/xx/2002, with manufacture of child pornography, in violation of 18 U.S.C. § 2251(a), distribution of child pornography, in violation of 18 U.S.C. § 2252(a)(2), aiding and abetting and willfully causing the manufacture and distribution of child pornography, in violation of 18 U.S.C. §§ 2251(a), 2252(a)(2), and 2, and attempting to do so, as outlined below.

3. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

4. The statements in this Affidavit are based on my investigation and other law enforcement officers' investigation of this matter. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause in support of the attached criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause for the arrest of KRAY STRANGE.

BACKGROUND OF THE INVESTIGATION

5. On October 5, 2021, as part of an ongoing child exploitation investigation, United States Magistrate Judge Lynne A. Sitarski, Eastern District of Pennsylvania, authorized a search and seizure warrant in magistrate number 21-1511-M for the person of Andrew Wolf and his residence in Philadelphia, Pennsylvania 19128. At the time, Wolf was a middle-school mathematics teacher at Springside Chestnut Hill Academy in Philadelphia, Pennsylvania.

6. After the execution of the search warrant for Wolf's residence and person, on October 7, 2021, United States Magistrate Judge Sitarski, approved a federal complaint and arrest warrant for Wolf in magistrate number 21-1530-M, charging him with the offenses of receipt and attempted receipt of child pornography, in violation of 18 U.S.C. § 2252(a)(2), and distribution, attempted distribution, and willfully causing the distribution of child pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and 2(b). On October 12, 2021, United States Magistrate Judge Richard A. Lloret, Eastern District of Pennsylvania, ordered Wolf be detained prior to trial in the matter.

7. Pursuant to the terms of the Search and Seizure Warrant 21-1511-M, the FBI seized several electronic devices from the person of Andrew Wolf and from his residence, including an Apple iPhone. The contents of Wolf's iPhone were extracted by the FBI's Regional Computer Forensic Laboratory (RCFL). A review of the extracted contents revealed that Wolf had the Telegram application installed on his iPhone, and his account was identified by a username of @bbd13, a telephone number of 215-858-6373, a Telegram ID of 578672700, and a display name of "Mr P." Telegram is a chatting application in which individuals can exchange text messages, images, and videos in private or group conversations.

8. Within the Telegram application, a private conversation was found between Wolf and a Telegram user with the display name “alex ibhjl” and a Telegram User ID of 1230181956 (hereinafter “Alex”). As described below, your Affiant has probable cause to believe the user/operator of the “Alex” account is KRAY STRANGE, date of birth April xx, 2002. The conversation between STRANGE (Alex) and Wolf occurred between approximately May 2, 2020 and October 7, 2021, and contained over 27,000 messages, to include approximately 4,000 image and video files. Your Affiant is aware that when the contents of a cellphone are extracted, the phone is placed in airplane mode and disconnected from all networks. Therefore, the only content extracted is that which is present on the phone itself, and not stored remotely on a server of an application or other electronic service, such as Telegram.

9. Upon reviewing the Telegram chats extracted by the RCFL, your Affiant observed that if the extracted content contained an image or video file that was no longer present on Wolf’s phone, the chat contained a notation that an image or video file was sent, but that the file was empty. In these instances, your Affiant could see the date and time the file was transmitted, but not the actual content itself. Of the approximately 4,000 image and video files that were sent in the Telegram chat between STRANGE and Wolf, approximately 3,500 were empty and contained no content.

10. A review of the Telegram conversation between STRANGE and Wolf revealed that STRANGE originally met Wolf online after reading Wolf’s erotic stories on the website nifty.org. STRANGE talked openly to Wolf about STRANGE’s efforts in “catfishing” or “baiting” minors to obtain sexually explicit images and videos. Your Affiant is aware that “catfishing” and “baiting” refers to the act of an individual impersonating someone online to

manipulate or trick another individual. STRANGE also discussed his surreptitious screen recording or capturing the conversations and the sexually explicit images and videos of the minors.

11. As part of his efforts to “bait” minor boys into self-producing sexually explicit images and sending them to him over the internet, STRANGE frequently impersonated a young teenage girl, using the aliases Alex/Alexandria and Leslie, among other personas.

12. Beginning in July 2020, Wolf and STRANGE started discussing the idea of STRANGE “baiting” Wolf’s minor male students. On or around August 16, 2020, Wolf informed STRANGE, “If I saw one of my students dicks I might cum in under 10 seconds.” As the conversation progressed, Wolf provided STRANGE with certain students’ names and social media accounts for STRANGE to target. In other instances, STRANGE brought up names and asked Wolf to confirm if they were his students before targeting them.

13. An example of STRANGE’s statements about “baiting” minors and screen recording or capturing conversations and files are described below:

a. May 5, 2020:

STRANGE: watching yt and baiting a kid

Wolf: kid you know?

STRANGE: [Minor’s Name Redacted]

...

STRANGE: he’s never done nudes before

Wolf: if anyone can get nudes u can

b. May 5, 2020:

STRANGE: Better [Inserts Instagram profile link, which depicts a profile picture of a minor boy]

Wolf: yesss. you gonna bait him?

STRANGE: really? that's a silly question mate

Wolf: Lol

STRANGE: already started

c. May 10, 2020:

Wolf: Can you send me a screen record of the chat again since he came back?

...

STRANGE: I will

Wolf: Thx

d. June 6, 2020:

STRANGE: I'm baiting him as a guy

...

Wolf: How old is he?

STRANGE: 14-15

e. June 11, 2020:

STRANGE: [Transmits file which is empty and not viewable by your Affiant]

Wolf: 14?

STRANGE: 13

Wolf: I approve. You baiting him on insta?

STRANGE: started on snap then moved over

f. July 25, 2020:

STRANGE: Do you have any boys you want me to bait?

Wolf: Like my students u mean?

STRANGE: Any boy. I'd even try ur nephews if you got info for it

g. August 1, 2020:

STRANGE: Send me a kid yk [you know] to bait ??

Wolf: Still thinking abt it

h. August 18, 2020:

Wolf: So did you give him a label for yourself? _____ sexual?

STRANGE: Mostly asexual

Wolf: This is all very interesting

STRANGE: The pan-sapi selective sexual would work too

Wolf: Makes sense. Like on one hand that really fits for you, but on the other hand it seems to contradict a lot of your proclivities. But maybe said proclivities are not actually asexual, even though they appear to be

STRANGE: Wdym

Wolf: Your baiting

STRANGE: How is that not sexual. The attraction is more submissive

...

STRANGE: Then continuing on the sapiosexual is the dominant side. And that's really brought out by younger cute guys.

...

Wolf: I'm confused at what Sapi has to do with dominance

STRANGE: Bc I enjoy being smarter than them.

i. October 6, 2020:

Wolf: oh I meant to ask...these screen recordings you've been doing recently...are they without the other person being able to tell you are doing it?

STRANGE: Yes

j. January 7, 2021:

Wolf: ooh, so you can screen record Snap with sound and without the other person knowing?

STRANGE: Yes

k. May 10, 2021:

STRANGE: So I tried a new screen recording app

Wolf: Ahh

STRANGE: And it let's me pause and resume recording

14. Your Affiant reviewed the approximately 500 files containing content exchanged between STRANGE and Wolf in the Telegram chat. In your Affiant's opinion, approximately 250 files depict child pornography within the meaning of Title 18 U.S.C. § 2256. The vast majority of these files were sent by STRANGE to Wolf in the Eastern District of Pennsylvania, and appear to depict minor victims that STRANGE "baited."

15. **Based on an analysis of the Telegram conversations and an analysis of the image and video files themselves, your Affiant believes that STRANGE sent Wolf sexually explicit files of at least 25 minor victims that he "baited," including minors identified as students at Springside Chestnut Hill Academy.** For charging purposes, information regarding one minor child is provided below:

a. *Minor Victim #1:* Between September 2020 and September 2021, the

following conversation occurred between STRANGE and Wolf regarding Minor Victim #1, whose identity is known to your Affiant. Minor #1 was 14 to 15 years old during the described chat and is known to reside in the Eastern District of Pennsylvania:

i. September 18, 2020:

Wolf: Dude

STRANGE: Yes?

Wolf: [Transmits file whose content is not viewable] Found this on a Tik-Tok profile, it's one of my students

...

Wolf: [Minor Victim #1's Username Redacted]

...

STRANGE: How old is [Minor Victim #1's Name Redacted]

Wolf: 14

ii. January 5, 2021:

STRANGE: I should mention – I've been talking to [Minor Victim #1's Name Redacted].

STRANGE: [Transmits file whose content is not viewable]

...

Wolf: Oh wow. I want to see as much as your convos as possible!!!!!!

i. January 6, 2021:

STRANGE: [Transmits 3 files whose content is not viewable]

Wolf: I guess don't push too much rn? Yay abs but we've seen seen that [Emoticon]. Come [Minor Victim #1's Name Redacted] stop being such a prude

ii. September 7, 2021:

STRANGE: School has started again for [Minor Victim #1's Name Redacted]

STRANGE: [Transmits image file titled "telegram-cloud-photo-size-1-5026454274833492395-y". The image depicts the close-up of a hand holding an erect penis in the foreground and furniture in the background]

STRANGE: Hi

Wolf: Ooh damn [Minor Victim #1's Name Redacted]. Yeah tmr first day. Welcome back!

STRANGE: He cummed in his underwear

Wolf: What a mess. He's hot af for an "older" boy

STRANGE: Yessir

STRANGE: [Transmits video file titled "telegram-cloud-document-1-5028605052265169266". Video is approximately 33 seconds in length and depicts what appears to be the screen recording of the Snapchat application. The video depicts a naked boy from mid-thigh to his neck. The boy masturbates and ejaculates onto an unknown piece of material.]

b. Minor #1 was interviewed and identified himself in the images described above. Minor #1 explained that he believed he was communicating on Snapchat with a girl named "Alex" who was approximately 14 to 15 years old, and that he used his cell phone to create these images at "Alex's" request and then sent the images to Alex via Snapchat.

16. During the conversation between STRANGE and Wolf, STRANGE provided certain information pertaining to his identity, described below:

a. In May 2020, STRANGE said he was in Upstate New York. In June 2020, STRANGE said he was taking a trip to Syracuse with his cousin.

b. STRANGE told Wolf his Dad is in the military, and that STRANGE has five siblings.

i. Further investigation revealed that STRANGE is one of six dependents listed in U.S. Army personnel records for STRANGE's father, a Chief Warrant Officer 4. The home address for every member of the family (with the exception of the oldest dependent) was listed as [xx] Champion Street in Carthage, New York. In October 2021, a search of the Accurint law enforcement database for this address resulted in records for multiple individuals, including KRAY STRANGE and both his parents.

c. In August 2020, STRANGE told Wolf he was leaving for College and would be living in an AirBnB until the dorms open. On November 18, 2020, STRANGE specified he was in Louisiana. In January 2021, STRANGE told Wolf he was switching to online only college, and would be going back to the school to get his belongings before returning to New York.

i. Through investigation, your Affiant determined that STRANGE was a student at Nicholls State University in Thibodaux, Louisiana during the 2020-2021 academic year. STRANGE attended in-person classes in Thibodaux in the fall of 2020, and he attended classes exclusively online in the spring of 2021.

d. STRANGE told Wolf his date of birth is April [xx].

e. On September 2, 2021, STRANGE told Wolf he signed his first lease.

i. Further investigation revealed that a Charter Communications internet account subscribed to KRAY STRANGE was activated at a residence in Carthage, New York (different from his parents' residence) on September 2, 2021. In November and December

2021, an FBI Task Force Officer conducted surveillance at this residence and observed a blue/teal colored Mitsubishi Mirage parked in the driveway of the residence on several occasions. Per the New York State Department of Motor Vehicles, the aforementioned vehicle is registered to KRAY STRANGE.

17. During the conversation in Telegram, STRANGE identified several other electronic accounts he has used, described further below:

a. Azampini22 (Kik): On August 20, 2020, Wolf proposed to STRANGE that they run a group on Kik for gay boys aged 12 to 15 years old. In order for the boys to maintain membership in the group, they would be required to send live sexually explicit photos of themselves to Wolf and STRANGE. STRANGE agreed to run the group with Wolf, and told Wolf he downloaded Kik. He provided Wolf with his Kik username: azampini22.

b. Leslie_hans2020 (Instagram): On May 10, 2020, STRANGE sent Wolf a video file titled “Screen Recording 2020-05-10 at 1.37.33 AM.” The video depicts the screen recording of the messages page of the user’s Instagram account. The account holder’s username, “leslie_hans2020,” is displayed at the top. The user clicks on one of the conversations, which brings up a video of a minor male masturbating.

c. Azampini297 (Snapchat):

i. On May 10, 2020, Alex and Wolf engaged in the following conversation:

STRANGE: its how I got so much from [Minor’s Name Redacted] till he blabbed to his therapist

Wolf: LOL

STRANGE: But I blocked him so no harm no foul

Wolf: Will you approach [Minor's Name Redacted] from your other account?

STRANGE: Azampini297. Look it up

ii. Within the extracted contents of Wolf's iPhone, a contact

was found with the following information:

1. Name: Alex Zampini
2. Source: Snapchat
3. Group: Friends
4. User ID: azampini297

d. Azampini296@gmail.com:

i. On January 1, 2021, Wolf and STRANGE engaged in the

following conversation:

Wolf: decided to make a google doc to help organize baiting my students. so far I put in the 6th grade but I'm going to keep working on it. I shared it with your azampini296@gmail.com gmail account, so if you log on there you should see a doc called "s boys" in your "shared with me" folder

STRANGE: Nice

ii. On February 16, 2021, Wolf and Alex engaged in the

following conversation:

STRANGE: I got a new phone and I might lose all our chats, maybe even my telegram login. If I don't text you on here in the next few hours email me at azampini296@gmail.com

Wolf: Hope you don't lose it all, but ok thx for the heads up

18. Through investigation, your Affiant linked KRAY STRANGE to these electronic accounts because the accounts used IP addresses that resolved to STRANGE's parents' residence

in Carthage, New York, to STRANGE's own residence in Carthage, New York after September 2, 2021, and to Nicholls State University in Thibodaux, Louisiana in the fall of 2020 when STRANGE was an on-campus student there.

CONCLUSION

19. Based on the information above, I respectfully submit that there is probable cause to believe that KRAY STRANGE committed violations of 18 U.S.C. §§ 2251(a) (manufacture of child pornography), 2252(a)(2) (distribution of child pornography), and 2 (aiding and abetting and willfully causing the manufacture and distribution of child pornography), and attempted to do so, on or around September 7, 2021, in connection with Minor #1.

20. Therefore, I respectfully request that the attached form of criminal complaint be issued with respect to KRAY STRANGE.

/s/ Daron Schreier

Daron Schreier
Special Agent
Federal Bureau of Investigation

Sworn to me this 17th
day of December 2021.

/s/ Honorable Marilyn Heffley

HONORABLE MARILYN HEFFLEY
United States Magistrate Judge